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July 18, 2012

Postal Regulatory Commission  
901 New York Ave NW, Suite 200  
Washington, DC 20268

re: Docket # MC2012-26

Dear Commissioners,

I am writing to ask that you disallow the US Post Office's enhanced services to PO Box customers, specifically;

1. The new ability to use the street address of the Post Office where the PO Box is located, rather than the conventional "PO Box 123, Anytown, MA 01234".
  - a. The new ability of PO Box customers to use the "#123" designation instead of the conventional "PO Box 123" form of address.
2. E-mail / text message notification to PO Box customers of items received. (Real Mail Notification)
3. Acceptance of parcels and other items from UPS, FedEx, DHL and other non-USPS carriers, where this has been prohibited for many years.

I make this appeal for the following reasons;

1. It places the US Postal Service in direct and unequal competition with thousands of small businesses all across the country.

Stores like mine, whether independent or franchised, are privately owned and represent the sole source of our income. In many cases - perhaps most - small business owners like me have financed the purchase of the business with loans secured by our homes.

This new competition from the USPS will result in significant loss of revenue and damage to my business. That will threaten not only my home, but also the jobs of the five people I employ.

2. It is fundamentally unfair competition.

- a. **There is no other enterprise in this society where one competitor can regulate another, even to the point of requiring them to turn over their customer list on a quarterly basis.**
- b. The USPS failed to follow the rules in rolling out these new services. It simply made the decision unilaterally and executed it without the necessary filings.
- c. Pitting the USPS against small business owners across the country is hardly a fair fight. Stores like mine simply do not have the funds to launch massive ad campaigns such as the millions spent on the “if it fits, it ships” Priority Mail campaign.

Simply stated, a small business does not have the luxury of running deficits. Our ad budgets must be funded from our own store revenue. As an owner, that means that every marketing dollar I spend actually comes out of my own pocket.

- d. We currently labor under other unfair rules, such as the ability of a postal customer to change his address from a PO Box to another address with a simple “Change of Address” form, while customers of Commercial Mail Receiving Agencies (CMRA) such as my store are prohibited from doing so.

This arbitrary regulation gives the USPS a substantial competitive advantage and is one that it created for itself against small businesses, who by and large are powerless.

di, When a CMRA mailbox customer moves, we are required to receive his mail for 6 months following termination and cannot re-mail it without paying for new postage.

The USPS simply follows the forwarding order.

dii. New USPS advantages are in various stages of discussion, such as 6 day delivery to PO Boxes but not CMRAs when the change to 5-day delivery is made.

diii. With the USPS in constant possession of an updated list of our customers, it appears that there is a significant risk of the USPS contacting them directly to solicit them away from us.

Finally, I encourage the PRC and the USPS to see stores like mine as an asset that is to be nurtured, not driven into financial ruin with arbitrary rules and unfair competition.

As an Authorized Shipper with the USPS, we accept a large number of letters and parcels every day, and we do it for free.

In my case, we service between 75 and 100 drop-off customers each day, reducing the workload of window clerks at our local USPS branch.

If you multiply my efforts by the approximately 10,000 Mail & Parcel stores across the country, you'll see that we represent a substantial labor and cost savings to the USPS.

Thank you for taking the time to consider this comment. Please feel free to contact me directly if you would like further information.

Sincerely,

Charles J. MacPherson, Owner  
Postal Center USA, Randolph MA